

SEP 23 1999

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September 22, 1999

Mr. Lester Snow
Executive Director, CALFED Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Re: CALFED Bay-Delta Program

Dear Sir,

Although the CALFED Bay-Delta Program does not address the central issue of water rights, it is an important part of the long-term solution to California's water needs. Therefore it is incumbent on program design that it adequately address water conservation as 1) a key strategic goal to reduce water needs, 2) a practical strategy for predicting water use, 3) a tool for integrating water storage and distribution, and 4) a means to significantly increase wildlife habitat restoration. By revising the current CALFED plan to take full advantage of water conservation, its chance for success will be greatly increased, while costs can be significantly reduced in both the short and long term. Until that happens, no long-term commitments and contracts should be made as part of the CALFED program and the EIR/EIS Record of Decision should be limited to 7 years.

The current CALFED program elements downplay the role of water conservation by subsuming it under the "Water Use Efficiency" rubric. By doing so, CALFED creates problems for the future by locking certain inefficiencies in place. All of California's water users must play a role in minimizing water needs, not just as a desired end, but as a part of program participation. As the system is now organized, water efficiencies developed by some parties will be obviated by a reallocation of the saved water to those who have not put equal effort into conservation measures.

The role of water conservation in reducing water need in California has been largely ignored by CALFED in making predictions of future usage. The experience over the last 15 years in Los Angeles and the East Bay area has not been integrated into the data modeling for CALFED. These voluntary and substantial water use reductions indicate that a great majority of Californians have the will and interest in water conservation to elevate it to a primary strategic element in planning. Yet the data used by CALFED to predict future needs does not include data from the East Bay and most of the savings from the Los Angeles area. The resulting distortion of water needs has led CALFED to propose far more dam and storage building than will actually be required were water conservation given its proper emphasis. By redirecting capital costs in the CALFED program from construction to constructive conservation incentive programs, there will be a true movement toward water efficiency.

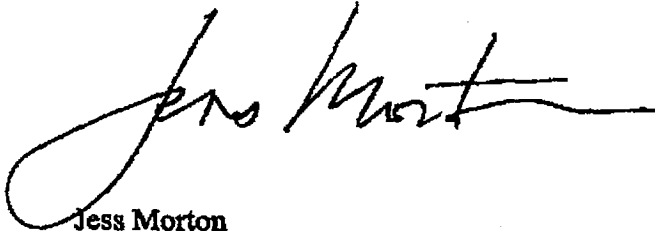
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If conservation were to be made a key strategic element in CALFED, an emphasis could be placed on adequate integration of ground and subsurface water management. As it stands, CALFED treats water as if it were only a surface element of the California environment. There is a continuing call for old solutions to the problem--more dams and above-ground reservoirs. Yet, the potential benefits to CALFED of subsurface storage and distribution are substantial. By tying aquifer management into CALFED through water recycling and other conservation measures, the future success of the program would be greatly enhanced.

Still another benefit to stressing the importance of conservation would be the potential increase in wildlife habitat made available through saved water. This would require redirecting water allocations under CALFED, since currently preserved or recovered water is reallocated to other, often less efficient, users. Provisions should be placed in CALFED that specify when and where saved water can be permanently assigned to habitat needs.

There is a pressing need to make conservation a primary theme of CALFED, not just something used as window dressing. As the draft proposal stands, water use efficiency and cost have been compromised by ignoring the proven potential of water conservation for influencing water usage and by CALFED's inability to integrate with other forms of water management. Until the CALFED program is revised to take conservation fully into account, no long-term contracts or commitments should be made, and the CALFED EIR/EIS Record of Decision should be limited to seven years.

Sincerely yours,



Jess Morton

cc: Gov. Gray Davis